

ROBINS KAPLAN LLP
ATTORNEYS AT LAW
LOS ANGELES

1 ROBINS KAPLAN LLP
 2 Roman M. Silberfeld, Bar No. 62783
 3 RMSilberfeld@rkmc.com
 4 David Martinez, Bar No. 193183
 5 DMartinez@rkmc.com
 6 Laura E. Nelson, Bar No. 231856
 7 LENelson@rkmc.com
 8 Jill S. Casselman, Bar No. 266085
 9 JSCasselman@rkmc.com
 10 2049 Century Park East, Suite 3400
 11 Los Angeles, CA 90067-3208
 12 Telephone: 310-552-0130
 13 Facsimile: 310-229-5800

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 15 Attorneys for Plaintiffs
 16 BEST BUY CO., INC.; BEST BUY
 17 PURCHASING LLC; BEST BUY
 18 ENTERPRISE SERVICES, INC.; BEST BUY
 19 STORES, L.P.; and BESTBUY.COM, L.L.C.

20
UNITED STATES DISTRICT COURT
 21 **NORTHERN DISTRICT OF CALIFORNIA**
 22 **SAN FRANCISCO DIVISION**

23
 24 IN RE: CATHODE RAY TUBE (CRT)
 25 ANTITRUST LITIGATION

26 Master Case No.: 3:07-cv-05944-SC
 27 MDL No. 1917

28 [Honorable Samuel Conti]

**DECLARATION OF JILL S.
 CASSELMAN IN SUPPORT OF
 PLAINTIFFS ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL PURSUANT TO CIVIL
 LOCAL RULES 7-11 AND 79-5**

29 This document relates to:

30 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
 31 *No. 11-cv-05513-SC*

32 *Best Buy Co., Inc., et al. v. Technicolor SA, et*
 33 *al., No. 13-cv-05264-SC*

34 *Target Corp. v. Chunghwa Pictures Tubes,*
 35 *Ltd., et al., No. 3:07-cv-05514-SC*

36 *Target Corp. v. Technicolor SA, et al., Case*
 37 *No. 3:11-cv-05514-SC*

38 *Alfred H. Siegel, as Trustee of the Circuit City*
 39 *Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,*
 40 *et al., No. 11-cv-05502-SC*

41 *Sears, Roebuck and Co., et. al. v. Chunghwa*
 42 *Picture Tubes, Ltd., et al., No. 11-cv-5514*

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1 Sharp Electronics Corporation, et al. v.
 2 Hitachi, Ltd., et al., No. 13-cv-01173-SC

3 Sharp Electronics Corp., et al. v. Koninklijke
 4 Philips Electronics N.V., et al., No. 13-cv-2776
 SC

5 ViewSonic Corporation v. Chunghwa Picture
 6 Tubes, Ltd., et al., No. 14-cv-02510

7 1. I am a member in good standing of the State Bar of California and am admitted to
 8 practice before this Court. Except for those matters stated on information and belief, which I
 9 believe to be true, I have personal knowledge of the facts recited in this declaration and, if called
 10 upon to do so, I would competently testify under oath thereto.

11 2. I am an attorney at the law firm of Robins Kaplan LLP, counsel for Plaintiffs Best
 12 Buy Co., Inc., Best Buy Purchasing L.L.C., Best Buy Enterprise Services, Inc., Best Buy Stores,
 13 L.P., and BestBuy.com, L.L.C. (collectively "Best Buy") in the above-captioned action. I submit
 14 this declaration pursuant to L.R. 79-5 in support of Plaintiffs'¹ Administrative Motion to File
 15 Documents Under Seal. The statements made herein are based on my personal knowledge.

16 3. Through this Motion, Plaintiffs seek permission to file under seal the entirety of
 17 Exhibits A, E, and I ("Designated Exhibits") to the Declaration of Jill S. Casselman filed in
 18 support of Plaintiffs' Motions *in Limine*.

19 4. The Designated Exhibits contain excerpts from and/or statements derived from
 20 documents and testimony which have been designated "confidential" or "highly confidential"
 21 pursuant to the Stipulated Protective Order governing the *CRT Antitrust MDL*, which was entered
 22 by Judge Samuel Conti on June 18, 2008 (Dkt 306). The confidential/highly confidential
 23 designations were made by certain defendants in the *CRT Antitrust MDL*. To qualify as
 24 confidential or highly confidential under the Stipulated Protective Order, the information must
 25 contain trade secrets or other confidential research, development or commercial information or

26 ¹ For purposes to this Declaration, "Plaintiffs" refers to Best Buy Co., Inc., Best Buy Purchasing
 27 LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P. and Bestbuy.com, L.L.C., Alfred
 28 H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust,
 Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.,
 Sears, Roebuck and Co., and Kmart Corporation, Target Corp., and ViewSonic Corp.

private or competitively sensitive information. (¶1).

5. The Stipulated Protective Order requires that a party may not file any confidential material in the public record (¶10). The Stipulated Protective Order further provides that any party seeking to file any confidential material under seal must comply with Civil Local Rule 79-5 (¶¶1, 10.).

6. The Designated Exhibits contain such confidential material and, pursuant to Local Rule 79-5(e), Plaintiffs seek to submit the above material under seal in good faith in order to comply with the Protective Order in the *CRT Antitrust MDL* and the applicable Local Rules. Specifically:

7. Exhibit A to the Casselman Declaration is a true and correct copy of excerpts from the deposition of Brian Stone taken on December 2, 2012, and designated as "Highly Confidential."

8. Exhibit E to the Casselman Declaration is a true and correct copy of excerpts from the deposition of James Smith taken on July 11, 2014, and designated as "Highly Confidential."

9. Exhibit I to the Casselman Declaration is a true and correct copy of Defendants' June 2, 2014 Opposition to Best Buy's Motion for a Protective Order and Cross-Motion to Compel Interrogatory Responses, designated as "Highly Confidential," and which contains and/or reflect information that has been designated as "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on this 13th day of February 2015, at Los Angeles, California.

/s/ Jill S. Casselman

Jill S. Casselman